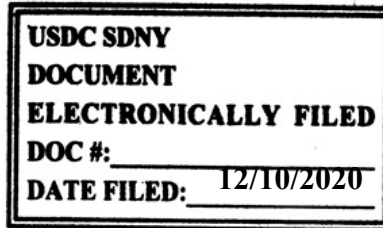


**BELDOCK LEVINE & HOFFMAN LLP**  
**99 PARK AVENUE, PH/26<sup>TH</sup> FLOOR**  
**NEW YORK, N.Y. 10016**

CYNTHIA ROLLINGS  
JONATHAN MOORE  
JONATHAN K. POLLACK  
HENRY A. DLUGACZ  
STEPHEN J. BLUMERT  
MARC A. CANNAN  
DAVID B. RANKIN  
LUNA DROUBI  
MYRON BELDOCK ((929-2016)  
LAWRENCE S. LEVINE ((934-2004)  
ELLIOT L. HOFFMAN ((929-2016)

TEL: (212) 490-0400  
FAX: (212) 277-5880  
WEBSITE: blhny.com

COUNSEL  
BRUCE E. TRAUNER  
PETER S. MATORIN  
KAREN L. DIPPOLD  
JEFFREY A. GREENBERG  
MARJORY D. FIELDS  
EMILY JANE GOODMAN  
(JUSTICE, NYS SUPREME COURT, RET.)  
FRANK HANDELMAN



REF:  
9000.2300  
WRITER'S DIRECT DIAL:  
212-277-5875

December 9, 2020

**VIA ECF**

Honorable Katharine H. Parker  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

**MEMO ENDORSED**

**Re: *Elsayed et al. v. City of New York et al.*, 18-cv-10566 (AT) (KHP)**  
**[rel. 18-cv-2334]**

Judge Parker:

We represent Plaintiffs in the above-referenced action. We submit this letter-motion pursuant to the Court's Individual Rule I.f. to request an adjournment of the telephonic Settlement Status conference scheduled with the Court and the Parties for Tuesday, December 15, 2020 at 3:00 p.m., (Dkt. No. 74), in order for the Parties to finalize the Individual Plaintiffs' stipulation of settlement and negotiate resolution of Plaintiffs' attorneys' fees. The Court granted Defendants' first request for an adjournment of the September 23, 2020 settlement conference regarding the Individual Plaintiffs' settlement and attorneys' fees, to which Plaintiffs consented. (*Id.*). Defendants consent to this request.

Defendants provided Plaintiffs with a draft stipulation of settlement for the Individual Plaintiffs on October 14, 2020. On November 5, 2020, the Court so ordered the Stipulation and Order of Settlement as to *Elsayed* and *Clark* Plaintiffs' injunctive claims. (Dkt. No. 78). Pursuant to paragraph 12 the Stipulation and Order of Settlement, "[t]he parties agree that Plaintiffs' Counsel in the *Clark* and *Elsayed* cases are entitled to 'reasonable attorneys' fees' under 42 U.S.C. § 1988 stemming from work done through the Effective Date [November 5, 2020]. The parties shall memorialize an agreement with respect to Plaintiffs' Counsel's attorneys' fees for work done through the Effective Date in a separate agreement." Plaintiffs' Counsel are finalizing review of

BELDOCK LEVINE & HOFFMAN LLP

Hon. Katharine H. Parker  
December 9, 2020  
Page 2

Defendants' draft stipulation of settlement for the Individual Plaintiffs and will be sending billing records through the Effective Date to Defendants.

We respectfully request a 45-day adjournment of the scheduled settlement conference, or a date on or about January 28, 2021, to allow Defendants to review Plaintiffs' billing records and for the Parties to determine whether they can resolve settlement as to attorneys' fees and the Individual Plaintiffs without the Court's intervention.

We appreciate the Court's attention to this matter.

Respectfully Submitted,

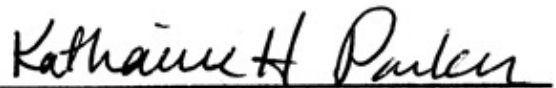


Luna Droubi

cc: All Parties (via ECF)

**APPLICATION GRANTED:** The telephonic settlement conference in this matter currently scheduled for Tuesday, December 15, 2020 at 3:00 p.m. is rescheduled to Wednesday, January 27, 2021 at 2:00 p.m. Counsel is directed to call Judge Parker's teleconference line at the scheduled time. Please dial (866) 434-5269, Access code: 4858267.

**APPLICATION GRANTED**



**Hon. Katharine H. Parker, U.S.M.J.**

**12/10/2020**